

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

<p>IN RE: PAVEL BALON</p> <hr/> <p>Freedom Mortgage, Movant</p> <p>vs.</p> <p>PAVEL BALON, Debtor</p>	<p>Case No. 19-17762-amc Chapter 13</p>
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NOTICE OF MORTGAGE FORBEARANCE DUE TO THE COVID-19 PANDEMIC

NOW COMES Creditor, Freedom Mortgage (“CREDITOR”), by and through undersigned counsel, and hereby submits Notice to the Court of the forbearance offer with respect to Creditor’s residential mortgage claim which is identified on the Court’s claim register as Claim No. 6 (the “Claim”).

The Claim is eligible for a forbearance period based upon the Debtor(s) material financial hardship caused by the COVID-19 pandemic. As a result, the Debtor(s) shall not be required to tender mortgage payments to Creditor that would come due on the Claim starting 04/01/2020 through 06/30/2021.

Creditor, at this time, does not waive any rights to collect the payments that come due during this forbearance period.

Debtor(s) will resume Mortgage payments beginning 07/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”).

Prior to the expiration of the forbearance period, Debtor(s) must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter inter loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.

Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Respectfully Submitted,

/s/ Andrew Spivack

Andrew Spivack
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Attorney for Creditor
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PAVEL BALON

Freedom Mortgage,
Movant

vs.

PAVEL BALON,
Debtor

Case No. 19-17762-amc
Chapter 13

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Mortgage Forbearance Due To The Covid-19 Pandemic has been electronically served or mailed, postage prepaid on April 22, 2021 to the following:

PAVEL BALON
86 GREENRIDGE CIRCLE
NEWTOWN, PA 18940

Paul H Young, Debtor's Attorney
3554 Hulmeville Road
Suite 102
Bensalem, PA 19020

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

U.S. Trustee
United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

/s/ Andrew Spivack
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